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To: School Food Authority Administrators

From: Christine Emerson, Director
School Nutrition Programs

Re: **Instructions for Verification:** LEAs with **greater than 80%** household response rate in the previous school year

Verification is the process by which Local Educational Agencies (LEAs) confirm the eligibility of a sample of approved applications for free and reduced-price school meals.

Congratulations! Your district had greater than 80 percent household response rate from household applications verified last school year. This means that you may choose the random sampling verification method.

The verification process must be completed by **November 15**. You must submit the Summary of Verification form to this office by **December 15**. It is highly recommended that you separate applications based on the categories listed on the Summary of Verification form (1a through 2). Separating the applications as they come in will ease the verification procedure immensely.

The following prototype letters are available at <http://www.opi.mt.gov/schoolfood/index.html> and are required to successfully complete the verification process. Contact our office at (406) 444-2501 if you have questions.

- Notification of Selection for Verification (*We Must Check Your Application*)
- Notification of Verification Results (*We Have Checked Your Application*)

Verification does **not** apply to:

- Residential Child Care Institutions, except for those with applications for attending day students;
- Schools in non-base years using Special Provisions 2;
- Households whose determinations are directly certified as eligible for free meals using SNAP (food stamp) reports;
- Homeless, migrant and/or runaway students identified by the LEAs homeless liaison; and
- Non-applicants approved by local officials (administrative applications).

See the following instructions for verification activities. For more information, use the *Eligibility Guidance for School Meals Manual*: <http://www.fns.usda.gov/cnd/Governance/notices/iegs/EligibilityManual.pdf> (starting on page 62) or call School Nutrition Programs at (406) 444-2501.

Instructions for Verification Activities (Random or Focused Methods)

Beginning of School Year to October 1

Collect and approve applications for free and reduced-price meals.

October 1 to November 15

Count the number of **applications** approved for free and reduced-price meals and the number of **students** approved on the applications as of **October 1**. *Directly certified, homeless and administrative students are not subject to verification, but the number of students must be included on the Summary of Verification.*

Complete items 1 through 3 on the Summary of Verification form.

1. Choose either the random or focused sampling methods and calculate the number of applications to verify. See attached “Verification Sample Methods”.
2. Draw the required number of applications. ***With the random method, do not verify less than or more than 3 percent. Round all decimals up to whole numbers. For instance 3.1 should be rounded up to 4.***
3. Once the applications have been drawn for verification, a “preliminary review” must be conducted. A person other than the determining official must check the applications pulled for verification to ensure that they were determined correctly before the verification process can proceed. For record keeping purposes you may use the Verification Activity Tracker form for each application drawn for verification. This form is found on the School Nutrition Website under Forms and Guidelines/Verification. You may also use the “confirming official” signature line on the free and reduced-price application to document the preliminary review.
4. Send the prototype Notification of Selection for Verification letters to the selected households. This letter is available at <http://www.opi.mt.gov/schoolfood/index.html>.
 - The household should have ten working days to submit income documentation.
 - The household may provide proof that the child is a member of a household receiving assistance under the SNAP (Food Stamp Program), TANF, FDPIR or foster care instead of providing income information.
 - The household must be provided with a name of the person at the district who can answer questions and provide assistance and a no-cost telephone number.
 - If a household does not respond, you must follow-up with that household at least once before that household is deemed non-responsive and meal benefits are ceased.
 - If a household selected for verification transfers out of the district before the information can be verified, a new application must be selected for verification.
5. Once responses have been received or determined unresponsive, re-determine the household’s benefits and send the prototype Notification of Verification Results letter to the households. This letter is available at <http://www.opi.mt.gov/schoolfood/index.html>. *All households for whom benefits are to be reduced or terminated must be given 10 calendar days written advance notice of the change.*

All verification activity must be completed by **November 15** (steps 1 through 5 above).

November 15 to December 15

Complete the Summary of Verification form and send it to School Nutrition Programs by **December 15** (keep copies of original applications, letters to households, and Summary of Verification form on file at the district).

Verification Sample Methods

LEAs with **greater than 80%** response rate during the previous year may use **random** or **focused** sampling.

Random Sample

This method requires verification of 3 percent of approved applications on file as of October 1.

1. Determine the sample size of 3 percent of all approved applications on file as of October eligible for verification (1b through 2).
 - **Round all fractions up** to whole numbers (ex: 73 applications x .03 = 2.16; you must verify 3 applications). ***At least one application must be verified.***
2. Draw a random sample from among these applications. Ways to take a random sample:
 - Use a selection interval. Divide the total number of approved applications by the sample size to determine the selection interval. For example, if you have 160 applications and 5 is the sample size, divide 160 by 5 = 32. Pull every 32nd approved application until 5 applications are selected.
 - Ask someone in the office to randomly draw the required number of applications.
3. Continue to step 3 on previous page.

Focused Sample

This method requires verification of 1 percent of total approved applications on file as of October 1 selected from approved error-prone households (1c and 2) **plus** 0.5 percent of **applications** approved based on SNAP (Food Stamp), FDPIR or TANF case numbers (1b). *This method is suitable for larger school districts.*

1. Take the 1 percent portion of the sample:
 - *Calculate* the sample size of 1 percent from **all** approved applications on file as of October 1 (include ALL applications except directly certified, homeless and administrative). Round fractions up to whole numbers.
 - *Draw* the sample from only the error-prone applications.
 - If there are more applications that meet the criteria than needed, select a random sample from those applications.
 - If there are not enough applications that meet the criteria, select applications that are closest to the income eligibility guidelines.
 - At least one income application must be verified if there are any such applications on file.
2. Take the 0.5 percent portion of the sample:
 - *Calculate* the sample size of one-half of one percent from the total number of applications approved based on SNAP (Food Stamp), FDPIR, or TANF case number on file as of October 1 (1b). Round fractions up to whole numbers.
 - *Draw* the sample from the same applications (1b) using any method that is equitable and ensures that the same household is not selected each year.
 - At least one SNAP (Food Stamp), FDPIR or TANF application must be verified if there are any such applications on file.
3. Add the number of applications in the 1 percent sample to the number of applications from the 0.5 percent sample. This is your total number of applications to be verified.
4. Continue to step 3 on previous page.

Verification Definitions & Tips

Did Not Respond

Non-response rate is defined as the percentage of approved household applications selected for verification for which verification information was not obtained by the LEA. This definition is used to determine if a follow-up contact is required and to report the non-response rate on the Summary of Verification Report.

The following are considered non-responses:

- ✓ The household does not contact the LEA when the initial request for verification is sent or when the LEA attempts follow-up;
- ✓ The household responds to the initial request but provides incomplete information and the LEA is unable to determine if the eligibility determination was correct; or
- ✓ The household responds to the initial request but fails to provide the LEA with documents or is otherwise unable to provide appropriate documentation.

Any of these outcomes must be reported as “Did Not Respond” in line 8 on the Summary of Verification Report. *School districts are strongly encouraged to conduct aggressive follow-up to get 100 percent response rate during the verification process.*

Qualify for Reduced Verification Requirements

School districts will continue to qualify for reduced verification requirements (i.e., qualify for the random sampling method) during the subsequent year if it achieves a response rate (from households drawn for the verification process) of 80 percent or higher during the current year’s verification activities. LEA’s that do not obtain an 80 percent or higher response rate are required to conduct the error prone sampling method the following school year. For instance if the school verifies two applications and one is determined as nonresponsive, the LEA would have a 50 percent response rate and be required to conduct the error prone verification sampling method the following school year.

Error-Prone Applications

Application income reported within \$100 per month or \$1,200 per year of the Income Eligibility Guidelines.

Categorically Eligible

Students eligible for free benefits due to a member of household receiving assistance from the SNAP (Food Stamp Program), Food Distribution Program on Indian Reservations (FDPIR) or Temporary Assistance for Needy Families (TANF) and reporting the case number on the free and reduced-price application.

Update: This now also includes Foster Children as categorically eligible.

Directly Certified

Students eligible for free benefits based on documentation obtained directly from the appropriate State or local agency authorized to certify that the children are members of a SNAP (Food Stamp), FDPIR or TANF household. These will be your students determined as eligible for free school meals using data from SNAP (Food Stamp) reports. This determination supersedes all other eligible categories. The more students that your district has directly certified, the less applications in your pool that are subject verification, therefore, the less applications that need to be verified.

Recent USDA policy changed the determination of SNAP letters as no longer being a source of direct certification. However, the change will take some time to implement. For reporting purposes this year, you may count the letter method as directly certified.

Direct Verification

Obtaining verification documentation directly from the appropriate State or local agency for categorically eligible students.

Verification for Cause

The LEA has an obligation to verify all questionable applications (for cause). However, verification that is done “for cause” is **in addition to** and **should not be included** in the sample required for the formal verification process.